

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

DEC 10 2015

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

JAMES KING AND
ROBYN MCCARTY-KING,

Defendants.

4:15CR547 CEJ/NAB

INDICTMENT

COUNT ONE

The Grand Jury charges:

On or about January 3, 2011, within the Eastern District of Missouri, the defendants,

ROBYN MCCARTY-KING AND JAMES KING,

did embezzle, steal, purloin, or knowingly convert to their use, and the use of others, money of the United States or of any department or agency thereof, or any property made or being made under contract for the United States or any department or agency thereof, to wit: government funds in the amount of \$680.00.

In violation of Title 18, United States Code, Sections 641 and 2.

COUNT TWO

The Grand Jury further charges:

On or about January 13, 2011, within the Eastern District of Missouri, the defendant,

JAMES KING,

in a matter affecting interstate commerce, knowingly transferred, possessed, and used, without lawful authority, the means of identification of another, that being the name and account number of A.K., with the intent to commit, and in connection to the crimes of: theft of government funds, Title 18, United States Code, Section 641; possession of stolen mail, Title 18, United States Code, Section 1708; and, forgery, Missouri Statutes 570.030.

In violation of Title 18, United States Code, Sections 1028(a)(7) and 2.

COUNT THREE

The Grand Jury further charges that:

On or about May 3, 2013, within the Eastern District of Missouri, the defendant,

JAMES KING,

did receive, conceal, and unlawfully have in his possession mail which had been stolen and taken from a mail route and mail carrier, then knowing the article to have been stolen and taken.

In violation of Title 18, United States Code, Sections 1708 and 2.

COUNT FOUR

The Grand Jury further charges:

On or about June 3, 2013, within the Eastern District of Missouri, the defendant,

JAMES KING,

in a matter affecting interstate commerce, knowingly transferred, possessed, and used, without lawful authority, the means of identification of another, that being the account number of A.K., with the intent to commit, and in connection to the crimes of: theft of government funds, Title 18, United States Code, Section 641 and possession of stolen mail, Title 18, United States Code,

Section 1708.

In violation of Title 18, United States Code, Sections 1028(a)(7) and 2.

COUNT FIVE

The Grand Jury further charges:

On or about July 3, 2013, within the Eastern District of Missouri, the defendants,

JAMES KING AND ROBYN MCCARTY-KING,

did embezzle, steal, purloin, or knowingly convert to their use, and the use of others, money of the United States or of any department or agency thereof, or any property made or being made under contract for the United States or any department or agency thereof, to wit: government funds in the amount of \$718.00.

In violation of Title 18, United States Code, Sections 641 and 2.

A TRUE BILL.

FOREPERSON

RICHARD G. CALLAHAN
United States Attorney

TRACY L. BERRY, 014753 TN
Assistant United States Attorney